Spencer Press of Maine, Inc.	**)**	**Departmental**
York County	**)**	**Findings of Fact and Order**
Wells, Maine	**)**	**Part 70 Air Emission License**
A-38-70-A-I	**)**	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction:

FACILITY	Spencer Press of Maine, Inc. (Spencer)
LICENSE NUMBER	A-38-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2752-Commercial Printing
NATURE OF BUSINESS	Printing Facility
FACILITY LOCATION	90 Spencer Dr., Wells
DATE OF LICENSE ISSUANCE	
LICENSE EXPIRATION DATE	

B. Emission Equipment:

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	**UNIT CAPACITY**	**UNIT TYPE**
Boiler #1, 1B	11.71 MMBtu/hr	Boiler
Diesel Generator #1, 1DG	1.0 MMBtu/hr	Diesel Generator/Fire Pump
Air Rotation Unit 1H	3.91 MMBtu/hr	Heater
M850 Printing Press, 1P	3,278 lbs finished material/hr	Lithographic Printing Press
Dryer 1P	4.4 MMBtu/hr	Dryer associated with printing press
M1000A Printing Press, 2P	2,359 lbs finished material/hr	Lithographic Printing Press
Dryer 2P	3.7 MMBtu/hr	Dryer associated with printing press

M1000B Printing Press, 3P	6,641 lbs finished material/hr	Lithographic Printing Press
Dryer 3P (two identical units)	5.90 MMBtu/hr (each)	Dryers associated with printing press
M110B#1 Printing Press, 4P	1,962 lbs finished material/hr	Lithographic Printing Press
Dryer 4P	2.96 MMBtu/hr	Dryer associated with printing press
M110B#2 Printing Press, 5P	1,962 lbs finished material/hr	Lithographic Printing Press
Dryer 5P	2.96 MMBtu/hr	Dryer associated with printing press
M3000 Printing Press, 6P	15,031 lbs finished material/hr	Lithographic Printing Press
Dryer 6P/Ecotherm Thermal Oxidizer (2TO)	11.9 MMBtu/hr	Integrated unit of dryer/VOC incinerator
M3000 Printing Press, 7P	15,031 lbs finished material/hr	Lithographic Printing Press
Dryer 7P/Ecotherm Thermal Oxidizer (3TO)	11.9 MMBtu/hr	Integrated unit of dryer/VOC incinerator
Ka-Tec Thermal Oxidizer, 1TO (controls 1P-5P)	5.70 MMBtu/hr	VOC Incinerator
41 Domino Ink Jet Printers, 1DV-23DV	Variable	Domino Ink Jet Printers for printing mailing labels
4 Cheshire Video Jet Printers, 1CV-4CV	Variable	Cheshire Video Jet Printers for printing mailing labels
Safety Kleen Degreaser, 1SK	15 Gallons of Solvent (capacity)	Safety Kleen Degreaser Unit

Spencer has additional insignificant activities which do not need to be listed in the emission equipment table above. These insignificant activities can be found in their license application.

C. Application Classification:

The application for Spencer does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source. This license supercedes all previous air emission licenses issued to Spencer by the Department. All previous licenses are no longer in effect.

II. EMISSION UNIT DESCRIPTION

A. Process Description

Spencer Press conducts heatset web offset lithography at their Wells, Maine facility. Offset lithography consists of an unwind stand, in-feed, printing stations, drying, chilling and folding.

Paper utilized for printing is provided in large rolls which are placed on the unwind stand, allowing for the continuous supply of paper, known as the web. The web then enters the in-feed section where a variety of roller/pulleys apply tension to the web throughout the entire printing press. After exiting the in-feed, the web enters the first printing station. The printing station consists of ink fountains, in-line rollers, water fountains, plate cylinders and blanket cylinders.

Spencer manufactures printing plates in the preparation room through a variety of methods, including art work and photography. Prior to leaving the prep room, the plates are treated such that the image area repels water and the non-image are accepts water. The plates are then placed on the plate cylinders. Ink and fountain solution are applied to the plate cylinder, which transfers the image to the blanket cylinder which in turn transfers the image to the web. The fountain solution is applied to the non-image area of the plate, thereby preventing the ink from adhering to this area. Fountain solutions typically contain isopropyl alcohol; however, Spencer uses an alcohol replacement fountain solution which contains water and various glycol ethers. Depending on the particular job specifications, the web may next enter additional printing stations.

After printing has been completed, the web enters a natural gas-fired dryer where temperatures reach approximately 500^{o}F and the remaining volatile constituents of the ink and fountain solution are evaporated. The web then passes through a series of chill rolls which cause a sudden drop in the web temperature, thereby setting the ink in the paper. Finally, the web exits the chillers and is folded and cut prior to entering the binding and labeling area where the finished product is assembled and mailing labels are applied.

During the printing process ink buildup will occur in the plate and blanket cylinders, negatively affecting the print image. When this occurs, the cylinders are cleaned using blanket wash, either by applying manually as for the two M110B units or automatically for the remaining presses.

B. Boiler #1:

Boiler #1 was manufactured by Johnston Boiler Company in 1981 with a maximum design heat input capacity of 11.71 MMBtu/hr firing natural gas. In addition, Boiler #1 has a burner that fires natural gas at a total combined maximum design heat input rate of 11,710 cubic feet per hour (ft^3/hr).

Streamlining

Opacity

Spencer accepts streamlining for opacity requirements. Chapter 101, of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

Particulate Matter

Spencer accepts streamlining for particulate matter (PM) requirements. Chapter 103 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) PM emission limit in this license is more stringent.

Sulfur Dioxide

Spencer accepts streamlining for sulfur dioxide (SO_2) requirements. Chapter 106 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) SO_2 emission limit in this license is more stringent.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of hours of boiler operation.

Based on the type and amount of fuel for which the boilers were designed, there is no reasonable likelihood of the boilers to exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

C. Diesel Generator #1:

Diesel generator #1 was manufactured by Detroit Diesel Allison Products in 1980 with a maximum design heat input capacity of approximately 1.0 MMBtu/hr firing diesel fuel with a maximum sulfur content not to exceed 0.05% by weight.

Streamlining

Sulfur Dioxide

Spencer accepts streamlining for sulfur dioxide (SO_2) requirements. Chapter 106 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) SO_2 emission limit in this license is more stringent.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of hours of generator operation and diesel fuel use through purchase receipts.

Based on the type and amount of fuel for which diesel generator #1 was designed, there is no reasonable likelihood of diesel generator #1 to exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

D. Air Rotation Unit, 1H:

Air rotation unit, 1H has a rated input heat capacity of 3.91 MMBtu/hr firing natural gas was manufactured in 1998. Air rotation unit 1H is used to heat a storage building.

Streamlining

Opacity

Spencer accepts streamlining for opacity requirements. Chapter 101, of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

Sulfur Dioxide

Spencer accepts streamlining for sulfur dioxide (SO_2) requirements. Chapter 106 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) SO_2 emission limit in this license is more stringent.

Based on the type and amount of fuel for which air rotation unit 1H was designed, there is no reasonable likelihood of air rotation unit 1H to exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

E. Ka-Tec, Thermal Oxidizer:

The Ka-Tec TVA 800 Series, thermal oxidizer is used to control VOCs from printing presses 1P-5P. The Ka-Tec thermal oxidizer was manufactured in 1985 and installed in 1991.

The Ka-Tec combustion system uses cleaned exhaust gases that have been subject to 1,300-1,400°F for 0.7 seconds to preheat the incoming press and dryer emissions. The system then subjects the press and dryer emissions to a turbulent mixing zone and a sufficient retention time at elevated temperatures in order to achieve destruction efficiencies of 98% or greater.

To ensure a minimum destruction efficiency of 98%, the combustion chamber shall maintain a temperature of at least 1,300°F. This temperature shall be monitored with a thermocouple equipped with a continuous chart recorder in the thermal combustion system at the combustion chamber exit. The thermocouple shall not be in direct contact with the auxiliary burner flame.

Streamlining

Sulfur Dioxide

Spencer accepts streamlining for sulfur dioxide (SO_2) requirements. Chapter 106 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) SO_2 emission limit in this license is more stringent.

Opacity

Spencer accepts streamlining for opacity requirements. Chapter 101, of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of hours of Ka-Tec operation.

Based on the type and amount of fuel for which the Ka-Tec was designed, there is no reasonable likelihood of the Ka-Tec to exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

Sources that vent to the Ka-Tec thermal oxidizer:

Printing Press, 1P:
Lithographic Printing Press, 1P, model number M850, was manufactured by Heidelberg Harris, Inc. in 1980 with a nominal hourly, process rate of 3,278 pounds of printed paper. The raw materials that feed printing press, 1P, are paper, inks, Fountain solution, and Blanket wash.

Dryer 1P:
Dryer 1P, model number 10242, was manufactured by Tec-Systems. This natural gas fired dryer reached a temperature of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press, 1P, before the ink is set. Dryer 1P has a nominal firing rate of 4,400 SCF/hr (equates to a nominal heat input rate of 4.4 MMBtu/hr).

Lithographic Printing Press, 2P:
Lithographic Printing Press, 2P, model number M1000A, was manufactured by Heidelberg Harris, Inc. in 1976 with a nominal hourly, process rate of 2,359 pounds of printed paper. The raw materials that feed printing press, 2P are paper, inks, fountain solution, and blanket wash.

Dryer 2P:
Dryer 2P, model number OF-4289, was manufactured by Thermo Electron. This natural gas fired dryer reached temperatures of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press, 2P, before the ink is set. Dryer 2P has a nominal firing rate of 3,700 SCF/hr (equates to a nominal heat input rating of 3.70 MMBtu/hr).

Lithographic Printing Press, 3P:
Lithographic Printing Press, 3P, model number M1000B, was manufactured by Heidelberg Harris, Inc. in 1990 with a nominal hourly, process rate of 6,640.5 pounds of printed paper. The raw materials that feed printing press, 3P are paper, inks, fountain solution, and blanket wash.

Dryer 3P:
Dryer 3P, model number OF-4009, is actually two identical dryers, each with a maximum heat input rating of 5.9 MMBtu/hr. This natural gas fired dryer which was manufactured by Thermo Electron, reaches temperatures of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press, 3P, before the ink is set. Dryer 3P has a total nominal firing rate of 11,800 SCF/hr (equates to a nominal heat input rating of 5.90 MMBtu/hr for each dryer).

Lithographic Printing Press, 4P:

Lithographic Printing Press, 4P, model number M110B#1, was manufactured by Heidelberg Harris, Inc. in 1987 with a nominal hourly, process rate of 1,962.3 pounds of printed paper. The raw materials that feed printing press, 4P are paper, inks, fountain solution, and blanket wash.

Dryer 4P:
Dryer 4P, model number F-4156A, was manufactured by Thermo Electron. This natural gas fired dryer reached temperatures of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press, 4P, before the ink is set. Dryer 4P has a total nominal firing rate of 2,960 SCF/hr (equates to a nominal heat input capacity of 2.96 MMBtu/hr).

Lithographic Printing Press, 5P:
Lithographic Printing Press, 5P, model number M110B#2, was manufactured by Heidelberg Harris, Inc. in 1986 with a nominal hourly, process rate of 1,962.3 pounds of printed paper. The raw materials that feed printing press, 5P are paper, inks, fountain solution and blanket wash.

Dryer 5P:
Dryer 5P, model number 4008, was manufactured by Thermo Electron. This natural gas fired dryer reaches temperatures of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press, 5P, before the ink is set. Dryer 5P has a total nominal firing rate of 2,960 SCF/hr (equates to a nominal heat input capacity of 2.96 MMBtu/hr).

F. Dryer/Ecotherm #1:

The Dryer/Ecotherm #1 thermal oxidizer unit has two burners; each rated at 5.94 MMBtu/hr, for a combined total of 11.9 MMBtu/hr. The Ecotherm #1 is used to control VOCs from printing press 6P and dryer 6P. The Ecotherm #1 thermal oxidizer was manufactured and installed in 1994. The capture efficiency varies with raw material and the control efficiency is approximately 98%.

The Ecotherm #1 combustion system uses cleaned exhaust gases that have been subject to 1,300-1,400°F for 0.7 seconds to preheat the incoming press and dryer emissions. The system then subjects the press and dryer emissions to a turbulent mixing zone and a sufficient retention time at elevated temperatures in order to achieve destruction efficiencies of 98% or greater.

To ensure a minimum destruction efficiency of 98%, the combustion chamber shall maintain a temperature of at least 1,300°F. This temperature shall be monitored with a thermocouple equipped with a continuous chart recorder in the

thermal combustion system at the combustion chamber exit. The thermocouple shall not be in direct contact with the auxiliary burner flame.

Streamlining

Sulfur Dioxide

Spencer accepts streamlining for sulfur dioxide (SO_2) requirements. Chapter 106 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) SO_2 emission limit in this license is more stringent.

Opacity

Spencer accepts streamlining for opacity requirements. Chapter 101, of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of hours of Dryer/Ecotherm #1 operation.

Based on the type and amount of fuel for which Ecotherm #1 was designed, there is no reasonable likelihood of Ecotherm #1 to exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

The following sources vent to the Ecotherm #1 thermal oxidizer:

Lithographic Printing Press, 6P:

Lithographic Printing Press, 6P, model number M3000, was manufactured by Heidelberg Harris, Inc. in 1994 with a nominal hourly, process rate of 15,031 pounds of printed paper. The raw materials that feed printing press 6P are paper, inks, fountain solution, and blanket wash.

Dryer 6P:

Dryer 6P, model number V100-101, was manufactured by Stork Contiweb. This natural gas fired dryer reaches temperatures of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press 6P before the ink is set.

G. Dryer/Ecotherm #2:

The Dryer/Ecotherm #2 thermal oxidizer unit has two burners; each rated at 5.94 MMBtu/hr, for a combined total of 11.9 MMBtu/hr. The Ecotherm #2 is used to

control VOCs from printing press 7P and dryer 7P. The Ecotherm #2 thermal oxidizer was manufactured in 1998 and installed in 1999. The capture efficiency varies with raw material and the control efficiency is approximately 98%.

The Ecotherm #2 combustion system uses cleaned exhaust gases that have been subject to 1,300-1,400°F for 0.7 seconds to preheat the incoming press and dryer emissions. The system then subjects the press and dryer emissions to a turbulent mixing zone and a sufficient retention time at elevated temperatures in order to achieve destruction efficiencies of 98% or greater.

To ensure a minimum destruction efficiency of 98%, the combustion chamber shall maintain a temperature of at least 1,300°F. This temperature shall be monitored with a thermocouple equipped with a continuous chart recorder in the thermal combustion system at the combustion chamber exit. The thermocouple shall not be in direct contact with the auxiliary burner flame.

Streamlining
Sulfur Dioxide
Spencer accepts streamlining for sulfur dioxide (SO_2) requirements. Chapter 106 of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) SO_2 emission limit in this license is more stringent.

Opacity
Spencer accepts streamlining for opacity requirements. Chapter 101, of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

Periodic Monitoring
Periodic monitoring shall consist of recordkeeping which includes records of hours of Dryer/Ecotherm #2 operation.

Based on the type and amount of fuel for which Ecotherm #2 was designed, there is no reasonable likelihood of Ecotherm #2 to exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

The following sources vent to Ecotherm #2 thermal oxidizer:

Lithographic Printing Press, 7P:
Lithographic Printing Press, 7P, model number M3000, was manufactured by Heidelberg Harris, Inc. in 1998 with a nominal hourly, process rate of 15,031

pounds of printed paper. The raw materials that feed printing press 7P are paper, inks, fountain solution, and blanket wash.

Dryer 7P:
Dryer 7P, model number V100-101, was manufactured by Stork Contiweb. This natural gas fired dryer reaches temperatures of approximately 500°F to drive off the solvents (ink, fountain solution, and blanket wash) on the web of printing press 7P before the ink is set.

H. Inkjet Printers:

1. Cheshire Video Jet Printers (4 of them):
   Cheshire Video Jet Printers, 1CV-4CV, were each manufactured by Cheshire. These printers are each used to print mailing labels. The raw material used in each Cheshire Video Jet Printers is printed paper, ink and wash. Emission from 1CV-4CV are fugitive.

2. Domino Ink Jet Printers (41 of them):
   Domino Ink Jet Printers, 1DV-41DV, were each manufactured by Domino. These printers are each used to print mailing labels. The raw material used in each Domino Ink Jet Printer is printed paper, ink and wash. Emissions from 1DV-41DV are fugitive.

   By the end of June, 1999, Spencer will be installing 3 additional Domino printers to bring the total up to 41. The addition of these printers will not cause the ink or the wash limits to increase; therefore, there will be no increase in annual licensed emissions.

Periodic Monitoring
Periodic monitoring shall consist of recordkeeping which includes records of the amount of ink and the amount of wash used in all ink jet printers on a 12 month rolling total, based on purchase receipts.

I. Safety Kleen Degreaser:

Spencer operates one Safety Kleen parts washer for cleaning various metal parts. The parts washer is owned and maintained by Safety Kleen. The tank of the parts washer holds approximately 15 gallons of Safety Kleen 105 solvent.

Periodic monitoring
Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

J. Facility Emissions:

Total licensed annual emissions for the facility are based on the following raw material uses (all usages are based on a 12 month rolling total):

- Facility wide natural gas cap of 252.0 $MMft^3$/yr (records of purchase receipts shall be kept to demonstrate compliance with this limit)
- The diesel generator operating 100 hours per year
- Heatset ink usage of 9,295,000 lb/yr
- Fountain solution usage of 29,175 gallons/yr
- Blanket wash (including automatic and manual) usage of 25,400 gallons/yr
- Ink usage of 4,400 gallons/yr for the inkjet printers
- Wash usage of 1,500 gallons/yr for the inkjet printers

Also, the licensed annual emission included the following assumption which are recommended in the September 1993, *Control of Volatile Organic Compound Emissions from Offset Lithographic Printing Draft Control Techniques Guideline (CTG)* and the June 1994, *Alternative Control Techniques Document (ACT) for Offset Lithographic Printing*.

1. 70% of the fountain solution flashes off in the dryer.
2. 40% of the machine applied blanket wash flashes off in the dryer.
3. 20% of the VOCs in the ink are retained in the substrate.
4. The remaining 80% of the VOCs in the ink flash off in the dryer.
5. 100% of the remaining VOCs and HAPs that are not shipped off-site as hazardous waste, are emitted.

Total Allowable Annual Emissions for the Facility
(used to calculate the license fee)

Pollutant	**Tons/Year**
PM	21.2

PM_{10}	21.2
SO_2	0.11
NO_X	17.1
CO	14.4
VOC	109.2
HAP	28.0

III. AIR QUALITY ANALYSIS

Spencer previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-38-70-A-I, subject to the following conditions:

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emission units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license;

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, by may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**

(5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353;

(6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**

(8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(11) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(12) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:

(i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii) pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emissions testing; and

(c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

(13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there where intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on a interim basis prior to a

demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(14) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section of any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.

(16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.

(17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report that probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

(18) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such

monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(19) The licensee shall submit quarterly reports of any required monitoring as required by the Department. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement by the Department. The compliance certification shall include the following:
(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
(b) The compliance status;
(c) Whether compliance was continuous or intermittent;
(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
(e) Such other facts as the Department may require to determine the compliance status of the source;

(21) The Part 70 license shall be reopened for cause by the Department of EPA, prior to the expiration of the Part 70 license, if:
(a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
(c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or
(d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether

cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading or other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

(23) Permit Shield for Non-Applicable Requirements
The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated August 27, 1996.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
a.	Facility	Chapter 123	Paper coating regulation	Facility does not have a paper coater.
b.	Facility	Chapter 132	Graphic Arts-Rotogravure and Flexography	Facility does not conduct rotogravure or flexographic printing.
c.	Facility	Chapter 134	VOC RACT	Facility wide potential VOC emissions do not equal or exceed 40 TPY, excluding exempted equipment and processes. VOC emissions are BACT as specified in license amendment #2, #3 and #4.

(24) Boiler #1:

A. The boiler shall not exceed a heat input rate of 11.7 MMBtu/hr determined by the natural gas firing rate into the boiler. [ME DEP, Chapter 140, BPT]

B. Spencer shall fire only natural gas in Boiler #1. [ME DEP, Chapter 140, BPT] **Enforceable by State-only**

C. Emissions from the boiler shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	ME DEP, Chapter 103, Section 2(B)(1)(a)	-
PM_{10}	0.12	ME DEP Chapter 140, BPT	**Enforceable by State-only**

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.6	ME DEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	0.6	ME DEP Chapter 140, BPT	**Enforceable by State-only**

SO_2	0.01	ME DEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	1.1	ME DEP Chapter 140, BPT	**Enforceable by State-only**
CO	0.96	ME DEP Chapter 140, BPT	**Enforceable by State-only**
VOC	0.06	ME DEP Chapter 140, BPT	**Enforceable by State-only**

D. Spencer shall operate the boiler such that the visible emissions from the stack do not exceed 10% opacity based on a six (6) minute block average basis. [ME DEP, Chapter 140, BPT]

(25) Diesel Generator #1 shall comply with each of the following:

A. Diesel generator #1 shall not operate more than 100 hours per year. [ME DEP, Chapter 140, BPT]

B. Diesel generator #1 shall demonstrate compliance with its operational limit with a log book containing the dates and times of start-ups and shutdowns, and the initials of the operator. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

C. Diesel generator #1 shall burn only #2 fuel oil with a sulfur content not to exceed 0.05% by weight demonstrated by purchase records from the supplier within the accuracy of the test methods used. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

D. Emissions from diesel generator #1 shall not exceed the following:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.31	ME DEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	0.31	ME DEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	N/A	ME DEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	4.4	ME DEP Chapter 140, BPT	**Enforceable by State-only**
CO	1.0	ME DEP Chapter 140, BPT	**Enforceable by State-only**
VOC	0.4	ME DEP Chapter 140, BPT	**Enforceable by State-only**

E. Visible emissions from diesel generator #1 shall not exceed an opacity of 30% on a six (6) minute block average basis, for more than two (2) six (6) minute block averages in a 3-hour period. [ME DEP Chapter 101, Chapter 140, BPT]

(26) Air Rotation Unit 1H shall comply with each of the following:

A. Emissions from air rotation unit 1H shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	ME DEP, Chapter 103, Section 2(B)(1)(a)	-
PM_{10}	0.12	ME DEP Chapter 140, BPT	**Enforceable by State-only**

Pollutant	lb/hr	Origin and Authority	Enforceability

PM	0.47	ME DEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	0.47	ME DEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	0.01	ME DEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	0.38	ME DEP Chapter 140, BPT	**Enforceable by State-only**
CO	0.32	ME DEP Chapter 140, BPT	**Enforceable by State-only**
VOC	0.02	ME DEP Chapter 140, BPT	**Enforceable by State-only**

B. Visible emissions from air rotation unit 1H, shall not exceed 10% opacity based on a six (6) minute block average. [ME DEP, Chapter 140, BPT]

(27) The Ka-Tec Thermal Oxidizer shall comply with each of the following:

A. Emissions from the Ka-Tec thermal oxidizer (which accounts for all sources vented to it) shall not exceed the following:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	1.0	ME DEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	1.0	ME DEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	0.4	ME DEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	3.7	ME DEP Chapter 140, BPT	**Enforceable by State-only**
CO	0.7	ME DEP Chapter 140, BPT	**Enforceable by State-only**
VOC	4.4	ME DEP Chapter 140, BPT	**Enforceable by State-only**
HAP	0.03	ME DEP Chapter 140, BPT	**Enforceable by State-only**

B. Visible emissions from the Ka-Tec thermal oxidizer shall not exceed an opacity of 10%. [ME DEP, Chapter 140, BPT]

C. The combustion chamber of the Ka-Tec thermal oxidizer shall maintain a temperature of at least 1300°F. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

D. The Ka-Tec thermal oxidizer shall maintain a minimum retention time of 0.7 seconds in the combustion chamber. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

E. The minimum destruction efficiency of the Ka-Tec thermal oxidizer shall not fall below 98%. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

F. The temperature of the combustion chamber in the Ka-Tec thermal oxidizer shall be monitored with a thermocouple (that shall not be in direct contact with the auxiliary burner flame) equipped with a continuous chart recorder in the thermal combustion system at the combustion chamber exit. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

G. Every two years, Spencer shall stack test the Ka-Tec thermal oxidizer to demonstrate compliance for their VOC emissions. The stack testing shall be done in accordance with 40 CFR Method 25A. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

H. After two sets of stack testing results have been submitted, Spencer may submit an application to reduce the frequency of stack testing. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

(28) Ecotherm thermal oxidizer #1 shall comply with each of the following:

A. Emissions from Ecotherm thermal oxidizer #1 shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	ME DEP, Chapter 103, Section 2(B)(1)(a)	-
PM_{10}	0.12	ME DEP Chapter 140, BPT	**Enforceable by State-only**

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	1.42	ME DEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	1.42	ME DEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	0.02	ME DEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	1.16	ME DEP Chapter 140, BPT	**Enforceable by State-only**
CO	0.98	ME DEP Chapter 140, BPT	**Enforceable by State-only**
VOC	2.38	ME DEP Chapter 140, BPT	**Enforceable by State-only**
HAP	0.02	ME DEP Chapter 140, BPT	**Enforceable by State-only**

B. Visible emissions from Ecotherm thermal oxidizer #1 shall not exceed an opacity of 10%. [ME DEP, Chapter 140, BPT]

C. The combustion chamber of Ecotherm thermal oxidizer #1 shall maintain a temperature of at least 1300°F. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

D. Ecotherm thermal oxidizer #1 shall maintain a minimum retention time of 0.7 seconds in the combustion chamber. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

E. The minimum destruction efficiency of Ecotherm thermal oxidizer #1 shall not fall below 98%. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

F. The temperature of the combustion chamber in Ecotherm thermal oxidizer #1 shall be monitored with a thermocouple (that shall not be in direct contact with the auxiliary burner flame) equipped with a continuous chart recorder in the thermal combustion system at the combustion chamber exit. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

G. Beginning in 2001, and continuing every two years thereafter, Spencer shall stack test Ecotherm thermal oxidizer #1 to demonstrate compliance for their VOC emissions. The stack testing shall be done in accordance with 40 CFR Method 25A. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

H. After two sets of stack testing results have been submitted, Spencer may submit an application to reduce the frequency of stack testing. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

I. Whenever the M3000 printing press, 6P and dryer 6P, are in operation Ecotherm thermal oxidizer #1 shall be operated. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

(29) Ecotherm thermal oxidizer #2 shall comply with each of the following:

A. Emissions from Ecotherm thermal oxidizer #1 shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	ME DEP, Chapter 103, Section 2(B)(1)(a)	-
PM_{10}	0.12	ME DEP Chapter 140, BPT	**Enforceable by State-only**

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	1.42	ME DEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	1.42	ME DEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	0.02	ME DEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	1.16	ME DEP Chapter 140, BPT	**Enforceable by State-only**
CO	0.98	ME DEP Chapter 140, BPT	**Enforceable by State-only**
VOC	2.38	ME DEP Chapter 140, BPT	**Enforceable by State-only**
HAP	0.02	ME DEP Chapter 140, BPT	**Enforceable by State-only**

B. Visible emissions from Ecotherm thermal oxidizer #2 shall not exceed an opacity of 10%. [ME DEP, Chapter 140, BPT]

C. The combustion chamber of Ecotherm thermal oxidizer #2 shall maintain a temperature of at least 1300°F. [ME DEP, Chapter 140, BPT]

D. Ecotherm thermal oxidizer #2 shall maintain a minimum retention time of 0.7 seconds in the combustion chamber. [ME DEP, Chapter 140, BPT]

E. The minimum destruction efficiency of Ecotherm thermal oxidizer #2 shall not fall below 98%. [ME DEP, Chapter 140, BPT]

F. The temperature of the combustion chamber in Ecotherm thermal oxidizer #2 shall be monitored with a thermocouple (that shall not be in direct contact with the auxiliary burner flame) equipped with a continuous chart recorder in the thermal combustion system at the combustion chamber exit. [ME DEP, Chapter 140, BPT]

G. Every two years, Spencer shall stack test Ecotherm thermal oxidizer #2 to demonstrate compliance for their VOC emissions. The stack testing shall be done in accordance with 40 CFR Method 25A. [ME DEP, Chapter 140, BPT]

H. After two sets of stack testing results have been submitted, Spencer may submit an application to reduce the frequency of stack testing. [ME DEP, Chapter 140, BPT]

I. Whenever the M3000 printing press, 7P and dryer 7P, are in operation Ecotherm thermal oxidizer #2 shall be operated. [ME DEP, Chapter 140, BPT]

(30) Spencer shall limit their facility wide natural gas usage to no more than 252 $MMft^3$/yr (12 month rolling total). Spencer shall maintain records of annual natural gas use indicating the quantity of fuel consumed (ft^3/hr) demonstrated by purchase records from the supplier, and the heat content of the fuel combusted. [ME DEP, Chapter 140, BPT]

(31) The Domino Ink Jet Printers (41 of them) and the Cheshire Video Jet Printers (4 of them) shall comply with each of the following:

A. The total amount of make-up ink used in all of the printers shall not exceed 4,400 gallons per year (12 month rolling total). [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

B. Spencer shall maintain records of the annual makeup ink usage. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

C. Spencer shall Beta-test a new solvent recovery system on the Domino Ink Jet printers and report back to the Department no later than October 31, 2000 as to whether or not the test met the criteria (the quality of printing, quantity of ink used, and economic feasibility). [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

D. If the Department finds that the new solvent recovery system meets the criteria in condition 31(C), Spencer shall begin the installation of the new solvent recovery systems at the rate agreed upon by the Department and Spencer Press. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

E. VOC emissions from the inkjet printer ink shall not exceed 16.5 TPY (12 month rolling total). Spencer shall maintain documentation to demonstrate compliance with this limit. [ME DEP, Chapter 140, BPT]

F. HAP emissions from the inkjet printer ink shall not exceed 16.5 TPY (12 month rolling total). Spencer shall maintain documentation to demonstrate compliance with this limit. [ME DEP, Chapter 140, BPT]

(32) Inkjet Printer Wash:

A. Spencer shall use no more than 1,500 gal/yr (12 month rolling total), total, of wash in the inkjet printers. [ME DEP, Chapter 140, BPT]

B. Spencer shall keep proper documentation to demonstrate compliance with the wash used. [ME DEP, Chapter 140, BPT]

C. VOC emissions from the inkjet printer wash shall not exceed 5.0 TPY (12 month rolling total). Spencer shall maintain documentation to demonstrate compliance with this limit. [ME DEP, Chapter 140, BPT]

D. HAP emissions from the inkjet printer wash shall not exceed 5.0 TPY (12 month rolling total). Spencer shall maintain documentation to demonstrate compliance with this limit. [ME DEP, Chapter 140, BPT]

(33) Spencer shall not operate presses, M850, M1000A, M1000B, M110B#1, M110B#2, and M3000 unless the emissions from the presses are collected and sent to an operational thermal incinerator.[ME DEP, Chapter 140, BPT] **Enforceable by State Only**

(34) When calculating the annual facility emissions, the following assumptions shall be made. Also, Spencer shall keep monthly records. [ME DEP, Chapter 140, BPT]

1. 70% of the fountain solution flashes off in the dryer.
2. 40% of the machine applied blanket wash flashes off in the dryer.
3. 20% of the VOCs in the ink are retained in the substrate.
4. The remaining 80% of the VOCs in the ink flash off in the dryer.
5. 100% of the remaining VOCs and HAPs that are not shipped off-site as hazardous waste, are emitted.

(35) The total annual emissions from facility process equipment shall not exceed the following: [ME DEP, Chapter 140, BPT]

Pollutant	Tons/Year
VOC	109.2
HAP	28.0

(36) The Safety Kleen Degreaser shall comply with each of the following:

A. Facility shall label the parts washer with operational standards, equip the washer with cover if vapor pressure >15 mmHG at 100°F, close cover when not in use, drain parts for 15 seconds or longer, shall not degrease porous material, keep drafts < 40 m/minute, repair leaks, and keep records of solvent added and removed. [ME DEP, Chapter 130]

B. Spencer shall not use more than 65 gal/yr (12 month rolling total) of solvent in the Safety Kleen Parts Washer. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

C. Spencer shall keep proper documentation to demonstrate compliance with the solvent used in the Safety Kleen parts washer. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

D. VOC emissions from the Safety Kleen parts washer shall not exceed 0.22 TPY (12 month rolling total). Spencer shall maintain documentation to demonstrate compliance with this limit. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

E. HAP emissions from the Safety Kleen parts washer shall not exceed 13.1 lb/yr (12 month rolling total). Spencer shall maintain documentation to

demonstrate compliance with this limit. [ME DEP, Chapter 140, BPT] **Enforceable by State Only**

(37) **Recordkeeping**

For all recordkeeping required by this license, the licensee shall maintain records of the most current six year period. [ME DEP, Chapter 140]

(38) **Parameter Monitors**

The thermocouples on each thermal oxidizer must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source-operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. [ME DEP, Chapter 140] **Enforceable by State Only**

(39) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due within 30 days after the end of each calendar half with the initial seminannual report to be due March 30, 2000.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[ME DEP, Chapter 140]

(40) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due (October 30, 2000) with the submittal of the second semiannual report after the signature date of this license. [ME DEP, Chapter 140]

(41) **Annual Emission Statement**

The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [ME DEP, Chapter 137]

(42) The licensee is subject to the State regulations listed below.

Origin and Authority	**Requirement Summary**
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

(43) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 1999.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 27, 1996
Date of application acceptance: August 27, 1996

Date filed with the Board of Environmental Protection _____
This Order prepared by Tanya G. Hovell, Bureau of Air Quality.